

**HOGAN & HARTSON**  
**L.L.P.**

**DAVID L. SIERADZKI**  
PARTNER  
(202) 637-6462  
DLSIERADZKI@HHLAW.COM

COLUMBIA SQUARE  
555 THIRTEENTH STREET, NW  
WASHINGTON, DC 20004-1109  
TEL (202) 637-5600  
FAX (202) 637-5910  
WWW.HHLAW.COM

November 4, 2004

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., N.W.  
Washington, D.C. 20554

**Re: Federal-State Joint Board on Universal Service;  
Applications of Sprint Corp. for Designation as an Eligible  
Telecommunications Carrier in the States of Alabama,  
Florida, Georgia, New York, North Carolina, Pennsylvania,  
Tennessee, and Virginia; CC Docket No. 96-45**

Dear Ms. Dortch:

On behalf of Sprint Corporation ("Sprint"), this letter provides additional information requested by staff regarding the eligible telecommunications carrier ("ETC") applications referred to above. Sprint is submitting two versions of this letter: (1) an unredacted version with an attachment containing confidential trade secret information that Sprint requests be withheld from public inspection, pursuant to Section 0.459 of the Commission's rules; and (2) a redacted version, consisting of this identical cover letter but omitting the confidential attachment.

Sprint has demonstrated that it will use the universal service support it receives to improve wireless coverage throughout the areas for which it has requested ETC designation. Specifically, Sprint has reported that it "plans to incur capital expenditures in excess of \$150 million to construct over 500 new cell sites in the eight states covered by this application, and over \$40 million to upgrade and add capacity to over 500 existing cell sites in those states, between January 2004 and June 2005. These amounts are significantly higher than the amounts of high-cost universal service funds the Company expects to receive for these states

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(approximately \$11 million per year).” <sup>1/</sup> In response to a request from Commission staff for detailed backup data regarding this information, a spreadsheet is attached to the confidential version of this letter showing the following:

- Total planned capital expenditures for new cell sites and for cell site upgrades, broken down by state;
- Total estimated amounts of annual receipts from the high-cost universal service funds, broken down by state; and
- Lists of the planned new and upgraded cell sites, showing (for each site) the location, estimated population within the cell site service contour, proposed on-air date by calendar quarter, and proposed capital expenditures by year.

Sprint emphasizes that the data reported here represent its deployment plans at a particular point in time, and that the Company’s plans may change over time depending on consumer demand, fluctuation in universal service support, and related factors. <sup>2/</sup> These data represent commercial and financial trade secrets regarding Sprint’s network build-out plans, which are sensitive due to the highly competitive nature of the commercial wireless industry. Accordingly, Sprint respectfully requests that the Commission treat these data as confidential and withhold them from public inspection, pursuant to Sections 0.457(d)(1) and 0.459 of the rules.

The Commission staff also asked whether, given the controversy in the record over whether the Pennsylvania Public Utilities Commission lacks jurisdiction over Sprint’s ETC application, Sprint would object to having the applications for the seven states other than Pennsylvania processed promptly, while awaiting resolution of the jurisdictional question with regard to Sprint’s Pennsylvania application. Sprint would not object to this approach.

Finally, to the extent any waivers of Commission rules are necessary to enable Sprint to begin receiving support promptly as of the date on which it

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<sup>1/</sup> Sprint Supplemental Filing, CC Docket No. 96-45 (filed May 14, 2004), at 12.

<sup>2/</sup> Cf. *Federal-State Joint Board on Universal Service; Advantage Cellular Systems, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, CC Docket No. 96-45, DA 04-3357, ¶ 12 n.36 (Wireline Comp. Bur., released Oct. 22, 2004).

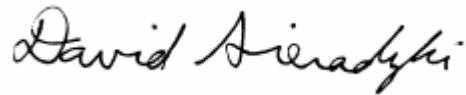
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receives ETC designation, Sprint respectfully requests that such waivers be granted at the same time as the ETC designation order is issued.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, reading "David Sieradzki". The signature is written in a cursive, flowing style.

David L. Sieradzki  
Counsel for Sprint Corporation

cc: Jeffrey Steinberg  
Frank Stilwell